

1 SHAWN PEREZ, ESQ.
Law Office of Shawn Perez
2 Nevada Bar No: 10421
626 S. Third St.
3 Las Vegas, Nevada 89101
(702) 485-3977
4 Attorney for Defendants,
Daniel Mulvany, Robert Daniels
5 & Mark Bolling

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,) CASE NO: 15-cr-00285-KJD-PAL
11)
Plaintiff,)
12 vs.) UNCONTESTED MOTION TO MODIFY
13 RYAN MATTHEW EATON,) TERMS AND CONDITIONS OF PRETRIAL
Defendant.) RELEASE
14)

15 Defendant Ryan Matthew Eaton, by and through his counsel of record, Shawn R. Perez,
16 hereby moves this Court to modify the terms and conditions of his pretrial release to allow the
17 defendant to retrieve his vehicle from the State of Montana prior to returning to Florida. This
18 motion is unopposed by Plaintiff and ratified by Pretrial Services in Las Vegas.

19 This motion is based on the following declaration of counsel and upon the pleadings and
20 papers filed in court on this Matter.

21 Dated: September 1, 2016

Respectively submitted,

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23 SHAWN R. PEREZ, ESQ.
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DECLARATION OF SHAWN R. PEREZ

I, Shawn R. Perez, do hereby declare and swear that the following is true and correct and of my personal knowledge except where so stated that it is based on my understanding and belief.

1. I am the attorney of record for Defendant Ryan Eaton in this matter, having been appointed by the Court on August 21, 2016 under the Criminal Justice Act.
2. Mr. Eaton was released on certain terms and conditions that included a travel restriction to Florida and Las Vegas, Nevada for purposes of this pending matter.
3. On September 1, 2016, I was contacted by Zach Bowen from Pretrial Services informing me that I would need to secure a modification of the defendant's travel restrictions in order to allow him to return a rental car and retrieve his vehicle that broke down en route from Montana to Las Vegas to make his timely appearance in this matter.
4. I was not aware that Mr. Eaton needed to return a rental car and retrieve his personal vehicle at the time that the terms and conditions of his pretrial release were set.
5. I apprised Assistant United States Attorney James Keller of the situation and he does not oppose this request.
6. Zach Bowen of pretrial services concurs that this modification is necessary and suggested via email that the modification should state that "the defendant's travel is restricted to Florida and Nevada for the court purposes only, unless pre-approved by Pretrial Services."
7. Defendant respectfully requests that the Court modify his current terms and condition of release as set forth above.

Executed this 1st day of September, 2016, in Las Vegas, Nevada under penalty of perjury under the laws of the United States of America.

/s/ Shawn R. Perez, Esq.

SHAWN R. PEREZ, ESQ.

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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
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10 UNITED STATES OF AMERICA,)

CASE NO: 15-cr-00285-KJD-PAL

11 Plaintiff,)

ORDER

12 vs.)

13 RYAN MATTHEW EATON,)

14 Defendant.)
15 _____)

16 Based upon the preceding motion and declaration of counsel and good cause appearing
17 therefore,
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19 **IT IS HEREBY ORDERED** that the terms and conditions of Mr. Eaton's pretrial
20 release shall be modified in part to read:

21 "The defendant's travel is restricted to Florida and Nevada for the
22 court purposes only, unless pre-approved by Pretrial Services."
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24 
25 United States Magistrate Judge

26 Dated: September 1, 2016
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